Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	RM 8535

Reply to Oppositions to Petitions for Reconsideration

INTRODUCTION

The United States Telephone Association (USTA) respectfully submits this reply to the oppositions to its petition for reconsideration of the Order released July 2, 1996, in the above-referenced proceeding.[1] USTA's local exchange carrier ("LEC") members will be both providers and beneficiaries of local number portability ("LNP").

DISCUSSION

I. Query-on-Release is Fully Consistent With the Principles Underlying the Commission's Performance Criteria

A number of parties attempt to perpetuate misconceptions about the Query-on-Release ("QoR") enhancement to Location Routing Number ("LRN") number portability.[2] Each of these parties raises essentially the same arguments in different form: 1) QoR should be rejected because it requires carriers to rely on another to route calls to the proper termination point; 2) QoR routes calls in a discriminatory fashion prohibited by the Act , or 3) QoR causes post-dial delay which will influence consumers' choice of carrier and degrades service quality when customers switch carriers. None of these arguments is factually or legally correct. Precluding QoR will simply increase the costs of local number portability with no concomitant benefits to competition or the public.

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[1]In the Matter of Telephone Number Portability, First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-286, CC Docket No. 95-116 (July 2, 1996)("First Report and Order"). Notice of this Order appeared in the Federal Register on July 25, 1996.

[2]See Opposition of ALTS at 1; Opposition of Sprint at 2; Opposition of AT&T at 7; Opposition of Time Warner at 2; Opposition of MCI at 6.

Public concern about the costs of number portability is only starting to grow, and any decision by the Commission that has the effect of making number portability less efficient and raises its costs would not be sound public policy.[3] The oppositions apparently ignore that when a call is originated on an ILEC network, it is the ILEC customer who pays for the call and the ILEC who has the incentive to keep local rates low. In a competitive market, all LECs must be afforded the discretion to determine the most efficient, non-discriminatory way to route their customers' calls in order to reduce costs in response to market incentives. Permitting carriers to utilize existing network efficiencies will also benefit the public by reducing the costs borne by all telecommunications carriers.[4] If carriers are able to distort regulations in order to raise their competitor's cost of local service, it is not just incumbent LECs, but fair competition and the local consumer that suffers the consequences.

QoR does not impermissibly create "reliance on another carrier's network." All of the oppositions contemplate a single calling scenario: a customer of an incumbent LEC ("ILEC") originates an interoffice local call to a ported number, which terminates on the network of a competing facilities-based carrier ("CLEC"). In this scenario, the ILEC must process and route the call to the CLEC network under both LRN with QoR, and LRN without QoR - thus the CLEC must rely on the originating ILEC.[5] The Commission's requirement that LNP permit carriers to route calls and provide services independently of the networks of other carriers cannot mean that ILEC customers may be precluded from calling persons who receive their service from a CLEC. Rather, the Order should be read to recognize that in a competitive market, a LEC must be free to utilize any non-discriminatory method for providing services to its own end users. See Order, para. 48.[6]

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[3]See Wall Street Journal, September 13, 1996, p. B1 (noting that the new telecommunications law is supposed to lead to lower prices for local service).

[4]Of course, the opponents of QoR do not address this issue, since they support cost recovery rules where they bear none of the costs of upgrading the ILEC network to provide them with this functionality in a ubiquitous fashion. See Further Reply Comments of MCI at 5, n.3.

[5]This is also true for calls which come into the ILEC network from another carrier who does not perform a database query to obtain the LRN information.

[6]In its comments, USTA stated that long-term LNP should not provide carriers with the ability to control the routing of calls by other competitors. USTA Comments, Sept. 12, 1995, at 7.

Time Warner acknowledges that "all interconnected carriers must rely on each other's networks to some extent," but claims that QoR requires competing carriers to rely on incumbents to "an unnecessary extent." Opposition of Time Warner at 4. Time Warner's argument is essentially that an ILEC sending an SS7 data message to the switch where the NXX of the called number resides is excessive reliance, while requiring the ILEC to send an SS7 data message to its own SCP to ascertain the LRN number is not.[7] In both cases, competing carriers must rely on the originating carrier to "handle the extra step without degrading service."[8]

QoR is not discriminatory. Some opponents of QoR recognize that an originating carrier will handle part of the call, but oppose permitting the originating carrier to handle different calls differently. But ported numbers must be treated differently than non-ported numbers in order to properly route the call under LRN (with or without QoR) or any other known number portability method. See Petition of Bell Atlantic at 9; Petition of PacTel at 10; Opposition of GTE at 4. Nothing in the 1996 Act or the Order requires a different conclusion.

A number portability arrangement where other service providers dictate how a LEC provides for non-discriminatory treatment of calls originating on its own network would violate this principle. But one carrier's use of QoR in its own network has absolutely no effect on how other carriers route their originating calls.

[7]The Order precludes the use of methods which "first route the call through the original service provider's network,." Order, para. 53. But any call originating on the ILEC network will of course be routed through that network. The Order also found that the competitive benefits of ensuring that calls are not routed in such a manner outweighs any cost savings from QoR. Order, paras. 53-54; see Appendix E, para. 7 (QoR "attempts to complete a call to the switch where the NPA-NXX of the dialed number resides"). But QoR does not route calls or attempt to complete calls to the switch where the NXX originally resides, it simply sends a data message to that switch.

[8]AT&T claims that LRN with QoR is distinctly different because while originating networks will always be in the call path, LRN with QoR requires that the originating LEC will always be performing number portability functions. Opposition of AT&T at 15. But this is a distinction without a difference. Of course, on an interexchange call, the interexchange carrier may very well perform the database dip, and the ILEC is not involved in number portability functions, with or without QoR. But in the scenario implied in AT&T's opposition (an ILEC customer making a local interoffice call to a ported number in an NXX which resides in the ILEC switch), if the originating carrier has deployed LRN without QoR, it must perform the database query. Thus, LRN without QoR also requires the originating LEC to perform number portability functions.

The argument that QoR is discriminatory boils down to an argument that the efficiencies of existing network design must be eliminated in order to foster competition. But this is not what the Commission concluded in the Interconnection Order, where the Commission found that the Act requires incumbents to share the economies of density, connectivity, and scale with new entrants, but in a manner that permits the incumbent LECs to maintain operating efficiency.[9] Neither the 1996 Act nor any sound policy decision requires that ILEC service be degraded in order to facilitate competition.

The Act requires non-discriminatory treatment, not identical treatment. See Petition of USTA at 8; Further Reply of Bell Atlantic at 2, n.8 (noting that a federal district court has previously rejected MCI's contention that "equal" access must be "identical facilities."). In the Second Interconnection Order, the Commission agreed: calls from competing providers must receive treatment that is "equal in quality."[10] This criteria does not require identical treatment.

Moreover, treating different calls differently within the network cannot lead to any anticompetitive harm if the difference is not noticed by the customer. From a calling party's perspective, LRN with QoR creates no difference between calls to ported numbers and calls to non-ported numbers. There is substantial evidence already on the record demonstrating that any delay associated with the use of LRN with QoR is imperceptible. See, e.g., Petition of Bell Atlantic at 3-4; Petition of BellSouth at 22; Petition of PacTel at 5-6; Petition of US WEST at 13. Each petition provided specific evidence that any delay is between .4 and .98 seconds.[11] Such short delays are

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[9] Report and Order, CC Docket 96-98, FCC 96-325 (August 8, 1996)("Interconnection Order"), para. 11.

[10] Second Report and Order, CC Docket 96-98, FCC 96-333, (August 8, 1996)("Second Interconnection Order"), para. 159; see also Id., para. 104 ("absolute technical equality," or an "overly microscopic" definition of equal access is not desirable), citing MTS and WATS Order (III), 100 FCC 2d 860 at 877 (1985)..

[11] AT&T's claim that there is no record evidence, at 13, is patently false. Even worse, MCI's claim that delay "associated with QoR" could be as high as 1700 milliseconds attempts to mislead the Commission. As MCI describes it, the 1700 millisecond figure depends on a number of factors not related to the use of QoR, e.g., whether continuity checks are performed. MCI's figure measures

extremely unlikely to be perceptible to customers. Therefore, QoR creates no difference in quality cognizable by the Act.[12]

The Act recognizes that it is only a delay experienced by the customer who switches carriers which has any relevance to competition. See 47 U.S.C. § 153(30) (LNP defined as the ability to retain a number "without impairment of quality...when switching from one telecommunications carrier to another").[13] The Commission found in the Second Interconnection Order that an "unreasonable dialing delay" should be measured not in absolute terms, but in competitive terms, by comparing delays experienced by ILEC customers to those experienced by CLEC customers. Second Interconnection Order, para. 160-164.[14]

Thus, under the Act and the Second Interconnection Order, even if such delay was perceptible, there is no harm to CLECs - whose customers will experience no delay. It is extremely difficult to see where any harm to a CLEC could arise if the difference is not experienced by the party using its service. Sprint claims "it is likely that callers who do perceive the delay will attribute such delay to the fact that the called party has switched to a CLEC." Opposition of Sprint at 4. ALTS claims that it is "completely surreal" to believe that carriers would attribute any perceived lack of service quality to the firm actually providing the service. ALTS believes that, even though their customers will never perceive any meaningful difference between calls from ported and non-ported numbers, the quality of service provided by an ILEC will "inevitably stigmatize competitive service." Opposition of ALTS at 3-4.

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total call set-up time, not delay associated with or attributable to the use of QoR.

[12]NEXTLINK states that actual customer perceptions are not illuminating since customers generally dislike all delays. But, of course, customers cannot dislike a delay which they do not perceive. Opposition of NEXTLINK at 5, n.2.

[13]Moreover, even where the ILEC does not perform any number portability functions, calls to the same subscriber may be handled differently, resulting in different post-dial delays. For example, some calls may be routed through a tandem, others directly. Such differences have never been considered discriminatory, and are not so considered under the Act.

[14]The Order also emphasizes that the concern about dialing delay is directed to whether the customer who switches carriers experiences any greater dialing delay. Order, para. 56.

Commission staff should ask themselves: when you place a call, do you know the identity of the called party's carrier? And if you experience any lack of service quality are you likely to attribute it to the called party's carrier? Most customers do not know (or care to know) the identity of the called party's carrier. In fact, customers have no way of knowing the identity of a called party's carrier - any more than a customer could tell what long distance carrier someone used when receiving an incoming long-distance call.[15] Customers generally hold their own carrier responsible for service quality.[16] Even subscribers who receive a large volume of incoming calls, see Opposition of AT&T at 11, will not forego using the services of a competitive carrier (particularly a carrier who offers better prices and service plans) for fear that business customers or other incoming callers will attribute an imperceptible difference in quality to that business's choice of a local carrier.

MCI, ALTS, and others argue that even where no perceptible delay exists, ILECs will use QoR to mount an advertising campaign to stigmatize competitive service providers. But since any delay is experienced by the ILEC customer, it seems more likely that new entrants would mount an advertising campaign concerning the ILEC's service quality. And it is difficult to see how such a campaign could be built on an imperceptible delay. Some opponents claim that such a campaign would be anticompetitive, even if the delay is imperceptible to consumers. See, e.g., Opposition of Sprint at 5. But if these parties are correct, then precluding the use of QoR would accomplish nothing - the campaign they describe could (or would) be mounted regardless of the network's actual operating characteristics. The Commission should not preclude the use of efficient technologies based on speculation that facts will be misrepresented in advertisements.[17]

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[15]Indeed, the whole point of local number portability is to make calling parties even less likely to know that the person they are calling has switched local carriers.

[16]Customers often hold their local carrier responsible for service quality concerns which do not even involve local services. Incumbent LECs routinely receive service calls from customers who have concerns with their long-distance carrier, information service provider, or a called party's wireless carrier. Thus, it is even more likely that incumbent LECs would bear the brunt of any perceived lack of service quality.

[17]It is difficult to see how advertising is "anticompetitive." In a competitive marketplace, all carriers will advertise that their respective networks offer superior quality. But customer's choices will depend on many other advertised factors, including price and service options.

II. There Are Significant Public Interest Benefits to Permitting LECs the Option to Deploy LRN Using QoR in Their Own Networks

The concerns about QoR are likely based on a misunderstanding of why ILECs want the option to deploy it in their networks. The interests in deploying QoR are these: 1) QoR will reduce the costs of local number portability; 2) QoR reduces such costs in part by preserving existing network efficiencies; and 3) by limiting the burden on the SS7 network, QoR will help speed deployment and pose less risk to network reliability. See, e.g., Petition of USTA at 7-10. The opponents of QoR claim that these arguments are overstated, misleading and incomplete. See, e.g., Opposition of MCI at 11. USTA and its members have provided specific information regarding the cost savings and network efficiencies associated with the use of LRN with QoR.

While any cost estimate will, of course, be subject to periodic adjustment, all estimates have one thing in common - the cost savings are in the millions of dollars. See, e.g., Order, para. 54; Petition of Bell Atlantic at 5, n.5; Petition of BellSouth at 23.[18] By eliminating queries not necessary to complete certain calls, LRN with QoR eliminates both the cost of unnecessary queries, the cost of unnecessarily expanded SS7 facilities, and the cost of switch replacements undertaken for the sole reason of accommodating the volume of queries.[19] It is irrelevant that the cost savings have only been estimated. Any savings will benefit the public, particularly given the level of costs involved and the potential impact on local rates.

A number of parties acknowledge that QoR creates additional network efficiencies. See,

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[18]USTA continues to encourage member companies to submit specific cost savings information, and to provide detailed analysis to the Commission. Of course, given the pending interconnection negotiations, specific estimates about the cost of switching functions will often require proprietary treatment.

[19]MCI's comparison to "Dr. Carl Sagan's universe" is false. Opposition of MCI at 11, n.8. The SS7 networks cannot be "easily expanded" to handle billions of LNP dips - such expansion involves considerable investment, construction and testing, all of which increase the costs of LNP. Time Warner is also incorrect - QoR does not require the addition of signaling beyond that required by LRN. Time Warner at 3. With LNP, data messages will be exchanged regardless of whether a data message is sent to determine whether a number is ported. And there are significant cost differences between a QoR data message and the database query required where QoR is not used.

e.g., Comments of Time Warner at 3. Other parties claim that network efficiencies are lost with QoR because: 1) trunks between the originating switch and the terminating switch must be reserved during call setup, which would not be needed if the originating switch performed a database dip under LRN (Opposition of MCI at 12); 2) unlike LRN, QoR requires software to be deployed not only in each end office switch, but in all intermediary switches; 3) QoR requires additional software on top of the LRN package, which will be removed when the "inevitable evolution" to pure LRN occurs. Opposition of AT&T at 17-18. None of these arguments demonstrates that QoR is inefficient.

Reservation of trunks for only the amount of time required to verify the need for it is possible with existing trunking capacity. Thus, this aspect of QoR creates no new trunking costs or network inefficiencies. Of course, LRN with QoR, like any other network capability, requires additional investment. But using LRN with QoR yields overall cost reductions. The cost of additional software has been considered in the cost savings estimates provided. The argument about the costs of "removal" is misleading. No costs are incurred by "removal" of QoR software. If a carrier elects to stop using the QoR functionality, that software is simply deactivated. As noted before, carriers in a competitive market must be free to engage in their own decision making regarding network investment.

Additionally, opponents of LRN with QoR disagree with the concerns raised regarding network reliability. Some claim that LRN with QoR actually poses a greater threat to network reliability, because network engineers will not be able to forecast the volume of SS7 queries. Opposition of MCI at 14. Where LRN is deployed with QoR, forecasting the volume of queries becomes a function of ported numbers, not ported NXXs. QoR makes SS7 planning more straightforward because it reduces the requirement for additional signaling network capacity. Moreover, because QoR does not require a database dip for routing to numbers that have not been ported, it enhances network reliability compared to LRN without QoR.

III. The Commission Should Be Open to Modifying Its Deployment Schedule

In its Petition, USTA suggested that the Commission should recognize that the absence of a specific request for interconnection, at a particular end office, should constitute grounds for a waiver of the deployment schedule. Petition of USTA at 16-17. Commenters on the Petitions support this approach. See, e.g., Opposition of Sprint at 11 ("Sprint agrees that ILECs should be allowed to request a waiver of the implementation schedule for offices in the top 100 MSAs for which they have not received a bona fide request for portability").

MCI and other parties apparently misunderstand USTA's Petition as recommending a "blanket waiver." USTA's Petition states that the Commission should establish that failure to receive an interconnection request constitutes "extraordinary circumstances beyond the LECs' control," thus constituting sufficient grounds for a waiver. USTA Petition at 16. USTA's Petition does not suggest a "blanket waiver." Rather, the Chief, Common Carrier Bureau should grant individual LEC waiver requests without any showing beyond the absence of a request being necessary. It appears that MCI could support this approach. See Opposition of MCI at 18; see also Opposition of AT&T at 21 (specific carriers can obtain relief from the implementation schedule).

However, as discussed in USTA's Comments on the Petitions (filed September 27, 1996) the Commission should determine that any and all carriers who will not receive such requests because of a legal exemption of the interconnection requirements should automatically be exempted from the LNP implementation schedule. Such an exemption makes practical sense, and will preserve state authority over the interconnection obligations of smaller LECs, both rural telephone companies who are automatically exempt, and other carriers who states have determined should be exempt. See 47 U.S.C. § 251(f); Order, para. 83.

Other modifications of the deployment schedule should also be entertained in order to ensure network reliability. The Commission should not rely exclusively on the results of the Chicago field trial for assurances of network reliability. MCI's claim that "[w]hat works in Chicago will work in the rest of the country, since all carriers use switches from the same few vendors and have similar

network designs," misses the mark. See Opposition of MCI at 17, n.10. USTA's understanding is that three vendors (and not all products and generics of those vendors) that are included in LNP are represented in Chicago. MCI is also well aware that all LECs do not have similar network designs, and that operational support systems can be quite different. The number of switches which must be replaced or modified, other network investment, and the impact of these changes on operational support systems and other areas will vary significantly from carrier to carrier. This is particularly true for small and mid-size carriers who introduce SS7 and/or AIN capabilities into their networks for the first time. We do not expect the Commission to treat network reliability concerns lightly.

CONCLUSION

The Commission should reconsider its First Report and Order on local number portability consistent with the recommendations described above.

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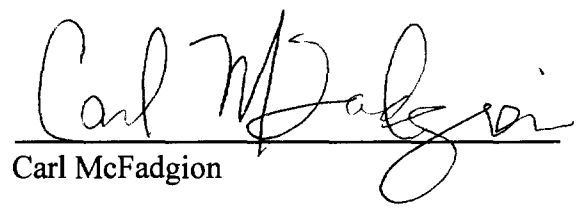
October 10, 1996

CERTIFICATE OF SERVICE

I, Carl McFadgion, do certify that on October 10, 1996 copies of the Reply to Oppositions to Petitions for Reconsideration of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the person on the attached service list.



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